

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF THE
KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX REFUND
SCHEME LITIGATION

MASTER DOCKET

18-md-2865 (LAK)

This document relates to: 18-cv-04434; 18-cv-04894;
18-cv-04899; 18-cv-05053; 18-cv-05374; 18-cv-07824;
18-cv-07827; 18-cv-07828; 18-cv-07829; 18-cv-08655;
18-cv-09797; 18-cv-09836; 18-cv-09837; 18-cv-09838;
18-cv-09839; 18-cv-09840; 18-cv-09841; 18-cv-10100;
19-cv-01781; 19-cv-01783; 19-cv-01785; 19-cv-01788;
19-cv-01791; 19-cv-01792; 19-cv-01794; 19-cv-01798;
19-cv-01800; 19-cv-01801; 19-cv-01803; 19-cv-01806;
19-cv-01808; 19-cv-01809; 19-cv-01810; 19-cv-01812;
19-cv-01813; 19-cv-01815; 19-cv-01818; 19-cv-01865;
19-cv-01866; 19-cv-01867; 19-cv-01868; 19-cv-01869;
19-cv-01870; 19-cv-01871; 19-cv-01873; 19-cv-01893;
19-cv-01894; 19-cv-01895; 19-cv-01896; 19-cv-01898;
19-cv-01904; 19-cv-01906; 19-cv-01911; 19-cv-01918;
19-cv-01922; 19-cv-01924; 19-cv-01926; 19-cv-01928;
19-cv-01929; 19-cv-01930; 19-cv-01931; 19-cv-10713.

DECLARATION OF MARC A. WEINSTEIN

I, Marc A. Weinstein, hereby declare as follows:

1. I am a partner at Hughes Hubbard & Reed LLP, counsel for Plaintiff

Skatteforvaltningen (“SKAT”) in this action. I am fully familiar with the matters set forth in this Declaration.

2. I submit this Declaration in support of SKAT’s Memorandum of Law in Opposition to Defendants’ Motion for Issuance of Requests for International Judicial Assistance to Obtain Evidence in Denmark.

3. Attached hereto as “Exhibit 1” is a true and correct copy of defendants’ Notice to Take Deposition of Skatteforvaltningen, dated November 13, 2020.

4. Attached hereto as “Exhibit 2” is a true and correct copy of excerpts from the transcript of the May 6 and 7, 2021 deposition of Christian Ekstrand, for which any errata currently are due on June 9, 2021 (Vol. 1) and June 18, 2021 (Vol. 2).

5. Attached hereto as “Exhibit 3” is a true and correct copy of excerpts from the transcript of the April 29, 2021 deposition of Jens Brøchner, for which any errata currently are due on June 2, 2021.

I, Marc A. Weinstein, hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
June 1, 2021

/s/ Marc A. Weinstein
Marc A. Weinstein